

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
FILED

UNITED STATES OF AMERICA,

Plaintiff,

2020 FEB 19 PM 3:54

CLERK OF COURT

20-CR-037

Case No. 20-CR-

v.

TODD J. NAZE,

Defendant.

[18 U.S.C. § 2251(a) and (e)]

Green Bay Division

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about October 30, 2018, in the State and Eastern District of Wisconsin,

TODD J. NAZE

knowingly and intentionally used a minor, Minor Female One, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: Img_3642.mov., using materials that had been mailed, shipped, and transported in interstate and foreign commerce, specifically, an iPod used as a hidden recording device and an external storage device containing the depiction.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 30, 2018, in the State and Eastern District of Wisconsin,

TODD J. NAZE

knowingly and intentionally used a minor, Minor Female One, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit:

Img_3642_moment2.jpg., using materials that had been mailed, shipped, and transported in interstate and foreign commerce, specifically, an iPod used as a hidden recording device and an external storage device containing the depiction.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 25, 2018, in the State and Eastern District of Wisconsin,

TODD J. NAZE

knowingly and intentionally used a minor, Minor Female Two, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: Img_3117.mov., using materials that had been mailed, shipped, and transported in interstate and foreign commerce, specifically, an iPod used as a hidden recording device and an external storage device containing the depiction.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 25, 2018, in the State and Eastern District of Wisconsin,

TODD J. NAZE

knowingly and intentionally used a minor, Minor Female Two, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: Img_3113.png., using materials that had been mailed, shipped, and transported in interstate and foreign commerce, specifically, an iPod used as a hidden recording device and an external storage device containing the depiction.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2018, in the State and Eastern District of Wisconsin,

TODD J. NAZE

knowingly and intentionally used a minor, Minor Female Three, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: Img_2815.mov., using materials that had been mailed, shipped, and transported in interstate and foreign commerce, specifically, an iPod used as a hidden recording device and an external storage device containing the depiction.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 14, 2018, in the State and Eastern District of Wisconsin,

TODD J. NAZE

knowingly and intentionally used a minor, Minor Female Three, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: Img_2831.png., using materials that had been mailed, shipped, and transported in interstate and foreign commerce, specifically, an iPod used as a hidden recording device and an external storage device containing the depiction.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 12, 2017, in the State and Eastern District of Wisconsin,

TODD J. NAZE

knowingly and intentionally used a minor, Minor Female Four, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: Img_0125.mov., using materials that had been mailed, shipped, and transported in interstate and foreign commerce, specifically, an iPod used as a hidden recording device and an external storage device containing the depiction.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 12, 2017, in the State and Eastern District of Wisconsin,

TODD J. NAZE

knowingly and intentionally used a minor, Minor Female Four, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: Img_0128.png., using materials that had been mailed, shipped, and transported in interstate and foreign commerce, specifically, an iPod used as a hidden recording device and an external storage device containing the depiction.

In violation of Title 18, United States Code, Section 2251(a) and (e).

FORFEITURE NOTICE

Upon conviction of any charge in the indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all visual depictions described in Title 18, Sections 2252 and 2256, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2252, and shall forfeit any property, real or personal, used or intended to be used to commit or promote the commission of such offenses, including, but not limited to, the following:

1. Any other equipment, instrumentalities, and items used or intended to be used in the transportation, shipment, production, receiving, distribution, or possession of child pornography.

A TRUE BILL:



FOREPERSON

Dated: February 19, 2020

A handwritten signature in black ink, appearing to read "Matthew D. Krueger".

MATTHEW D. KRUEGER
United States Attorney